

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

Caption in compliance with D.N.J. LBR 9004-1(b)

HILL WALLACK LLP

Elizabeth K. Holdren, Esq.

21 Roszel Road

P.O. Box 5226

Princeton, NJ 08543

Phone: 609-924-0808

Email: eholdren@hillwallack.com

*Attorneys for Wilmington Savings Fund Society,
FSB, as Owner Trustee of the Residential Credit
Opportunities Trust VI-A*

In Re:

John P. Conklin and Melissa A. Conklin,

Debtors.

Chapter: 13

Case No. 17-36011 (MBK)

Judge: Michael B. Kaplan, C.U.S.B.J.

Hearing: February 16, 2021 at 9:00 a.m.

**NOTICE OF MOTION FOR AN
ORDER GRANTING RELIEF FROM
THE AUTOMATIC STAY**

To: Jeanne A. Naughton, *Clerk*
United States Bankruptcy Court
402 E. State Street
Trenton, New Jersey 08608

Albert Russo
CN 4853
Trenton, NJ 08650-4853
Trustee

Brad J. Sadek, Esq.
Sadek and Cooper
1315 Walnut Street, Suite 502
Philadelphia, PA 19107
Debtors' Attorney

John P. Conklin
63 Guilford Place
Burlington, NJ 08016
Debtor

Melissa A. Conklin
63 Guilford Place
Burlington, NJ 08016
Joint Debtor

PLEASE TAKE NOTICE, that on February 16, 2021, at 9:00 a.m., or as soon thereafter
as counsel may be heard, Hill Wallack LLP, attorneys for Wilmington Savings Fund Society,

FSB, as Owner Trustee of the Residential Credit Opportunities Trust VI-A ("Wilmington"), shall move before the Honorable Michael B. Kaplan, C.U.S.B.J. at the United States Bankruptcy Court, 402 E. State Street, Courtroom #8, Trenton, New Jersey, for an Order granting Wilmington relief from the automatic stay with respect to the debtors, John P. Conklin and Melissa A. Conklin ("Debtors") pursuant to Section 362(d)(1) of the Bankruptcy Code with respect to real property located at 63 Guilford Court aka 63 Guilford Place, Burlington Twp., New Jersey 08016 (the "Property"), on which Wilmington holds a Mortgage; and

PLEASE TAKE FURTHER NOTICE, that Wilmington shall rely upon the Certification of Ron McMahan in support of its Motion; and

PLEASE TAKE FURTHER NOTICE, that in accordance with LBR 9013-1(a) and LBR 9013-4, a proposed form of Order is submitted herewith, and in accordance with LBR 9013-3(d), this motion will be decided on the papers unless opposition is filed.

HILL WALLACK LLP

*Attorneys for Wilmington Savings Fund
Society, FSB, as Owner Trustee of the
Residential Credit Opportunities Trust VI-A*

By: /s/ Elizabeth K. Holdren
Elizabeth K. Holdren

Dated: January 21, 2021